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February 5, 2020

Via Electronic Case Filing and E-mail

Honorable James L. Garrity
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: Penny Ann Bradley
Case No. 18-10122 (JLG)

Dear Judge Garrity:

As you know, this firm represents creditor Atlas Union Corp. (“Atlas”) in connection with the above-referenced chapter 11 proceeding. We write to correct a misstatement and an omission contained in Mr. Maniscalco’s correspondence to Your Honor, dated February 5, 2020 [Docket No. 237] (the “Status Letter”). Capitalized terms used but not defined herein have the meanings ascribed to them in Status Letter. Atlas **does not** consent to an adjournment of NSM Motion, to which Atlas filed a joinder [Docket No. 133]. Mr. Maniscalco **correctly** stated that Atlas does not consent to the adjournment of the Atlas Claim Objection. Furthermore, Atlas **does not** consent to the adjournment of the Case Status Conference or any of the other matters scheduled for February 12, 2020. Notwithstanding the foregoing, it will be fundamentally unfair to Atlas for the Atlas Claim Objection to be heard in a vacuum and before the NSM Motion, the Berman Motion, and the UST Motion. As such, in the event the Court is inclined to adjourn any of the matters currently scheduled for February 12, 2020 without Atlas’ consent, it is respectfully submitted that all matters, including the Atlas Claim Objection, be adjourned to the Court’s first available date thereafter, rather than nearly two months later as requested by Mr. Maniscalco.

Cole Schotz P.C.

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We thank the Court for its consideration.

Respectfully submitted,

/s/ Nolan E. Shanahan

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NES:dlr

cc: All counsel of record via e-mail